

U.S> Department of State, CA/OCS/PRI  
Adoption Regulations docket Room  
SA-29  
2201 C Street, N.W.  
Washington, DC 20521

DEC 1 -2003-

Comments in reference to docket number State/AR-01/96

I have had the pleasure over the past 9 years to work in the field of adoption and it has been one of the most rewarding experiences of my life. I work for a wonderful Christian Private adoption agency, HOPE for Children, inc. in the Atlanta area. I hope to do so for the rest of my working career. I am, however, alarmed about some of the proposed regulations that could jeopardize our agency and others like it, who exist for the sole purpose of giving "Hope for Children." I would appreciate your consideration of the following suggestions:

1. Lower the \$1,000,000 minimum limit requirement o adoption agency liability insurance. This insurance has become increasingly expensive during the past few years and our previous carrier has stopped underwriting adoption agencies, as of this year. It has been very difficult to find a new carrier. the high limit may encourage unnecessary lawsuits to be filed against agencies.
2. Eliminate the requirement that agencies must carry 3 months of operating expenses. Many agencies are heavily dependent on donations, in addition to fees. Given the uncertainties in the economy, coupled with the changes in international adoption programs many agencies will have difficulty fulfilling this requirement. It would be a shame to force many small agencies to go out of business when the need of the orphans is so great.
3. Allow more time for state licensing organizations, other than the COA, to become accrediting entities for the Hague regulations. Having only one or two alternatives will not provide a safeguard against high accrediting fees.
4. Reduce the requirement that Home Study Caseworkers have a Masters degree. Count other types of training, life experience, job experiences. I do happen to have a Masters degree in Education and 9 years of experience conducting home studies and post placement supervision but the excellent woman that I also work with does not. She provides invaluable advise and training to the adoptive parents and does an excellent job. I would like to see each person evaluated on their true merits and not just on a diploma.
- 5. Lastly, I request that these regulations be rewritten and republished BEFORE becoming final.**

Thanks you for your Consideration on these extremely important matters.

Sincerely,



Betsy Gooch  
Senior Caseworker  
HOPE for Children, Inc.